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September 22, 2016

Via First Class Mail and Fax: (757) 445-5445

Commander, Navy Region Mid-Atlantic
FOIA Coordinator
1510 Gilbert Street
Norfolk, VA 23511-2737

ATTN: Freedom of Information Act Request

Dear FOIA Coordinator:

Under the Freedom of Information Act, I am requesting access to records regarding Navy Award Number **N3904015P0118** which was awarded for contract performance at Naval Shipyard Portsmouth, Kittery, Maine, for IGF::OT::IGF SANITARY TANK CLEANING #1.

Specifically, I am requesting **all** contracting records involving the contract awarded to Xion Construction, LLC including the bid, communications between Xion and the contracting officer or contracting officer representative, modifications, subcontractors, and reasons for the termination for cause. The contract was terminated for cause on or about June 11, 2015.

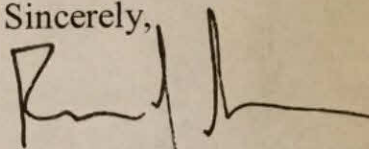
I have been appointed special counsel to a Chapter 7 bankruptcy trustee in two bankruptcy cases filed in the U.S. Bankruptcy Court for the District of Nebraska. I am requesting these records in relation to bankruptcy cases involving what we believe may be a related entities or persons, USA Construction Company, Inc. and Mohsen Niroomand-Rad.

If there are any fees charged for searching or copying the records, please let me know before you fill my request.

If you deny any part of this request, please cite each specific reason that you think justifies your refusal to release the information. Please notify me of appeal procedures available under the law.

If you have any questions processing this request, you may contact me at the following telephone number: 402-871-1060.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rex J. Moats', with a long horizontal flourish extending to the right.

Rex J. Moats, Esq.